

**VIA ECF**

**December 14, 2020**

Honorable Naomi Reice Buchwald  
United States District Judge  
500 Pearl Street, Room 2270  
New York, NY 10007

**Re: Simcha Feldman et al. v. Yechezkel Strulovitch et al., 20-cv-07270-NRB**

**JOINT LETTER**

Attorney for Plaintiffs Simcha Feldman et al. and  
Attorney for Defendants EIGHTEEN PROPERTIES LLC, KNICKERBOCKER LOFTS LLC, 296  
COOPER LLC; WILLTROUT REALTY LLC, STAGG STUDIOS LLC, TOMPKINS 420 REALTY  
LLC, 420 TOMPKINS, LLC

Dear Judge Buchwald,

Defendants EIGHTEEN PROPERTIES LLC, KNICKERBOCKER LOFTS LLC, 296 COOPER  
LLC; WILLTROUT REALTY LLC, STAGG STUDIOS LLC, TOMPKINS 420 REALTY LLC, 420  
TOMPKINS, LLC (the “**Defendants**”) in their previous letter filed on December 2, 2020 requested an  
adjournment to file responsive pleadings to Plaintiff’s Complaint until December 15, 2020 on  
Plaintiff’s counsel consent. In said letter Defendants also consented to align further with all scheduled  
dates with all the other defendants in this action.

Due to the results of December 14<sup>th</sup> pre-motion conference and given permission by your Honor  
to Plaintiff to file an Amended Complaint, and, in the light of judicial economy, Defendants and  
Plaintiffs are jointly respectfully requesting to permit Defendants to file responsive pleadings on the  
same date as it will be for the other Defendants’ responsive pleadings to Plaintiffs’ Amended  
Complaint, and not to hold Defendants in default for not responding to Plaintiffs’ Complaint on  
December 15, 2020.

Should Plaintiff fail to file Amended Complaint within thirty days, as permitted, Defendants  
responsive pleadings will be due January 15, 2020.

Cc: all parties via NYSCEF

Application granted.

**SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: December 15, 2020  
New York, N.Y.

COHEN, LABARBERA & LANDRIGAN, LLP

**/s/ Oxana Lukina**

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**/s/ Gerald Grunsfeld**

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